

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN-SOUTHERN DIVISION**

In Re:

James & Patricia Williams

Case No. 22-31232

Chapter 13

Hon. Applebaum

Debtor.

MOTION TO EXTEND STAY

NOW COME the Debtors, James & Patricia Williams, by and through their counsel, Bankruptcy Law Offices with George E. Jacobs and for their motion state as follows:

1. The Debtors filed the instant case on 8/18/2022.
2. The prior chapter 13 case was filed on 3/19/2020 and dismissed on 6/10/22.
3. That the stay should extend in this case because:
 - A. In the prior case the Debtors were unable to make the required payments due to marital issues that were occurring and because of family issue that extended from that.
 - B. The Debtors have resolved those issues and their personal and family issue are strong and stable.
 - C. In addition, the payments anticipated by the plan are lower and it is easier for them to make the required payments.
4. That changes such as those referenced above are those contemplated by the statute as a change in circumstances.

WHEREFORE, Debtors requests that this Honorable Court extend the stay.

Respectfully submitted,

Bankruptcy Law Offices

Dated: 8/30/22

By: /s/ George E. Jacobs
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